

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Joint Petition of Boston Edison Company,)
Cambridge Electric Light Company,)
Canal Electric Company and) D.T.E. 06-40
Commonwealth Electric Company d/b/a)
NSTAR Electric for Approval of Merger)

**PETITION FOR PARTY STATUS OF
RETAIL ENERGY SUPPLY ASSOCIATION**

Introduction

Pursuant to 220 C.M.R. § 1.03 and the June 12, 2006 Order of Notice issued by the Department of Telecommunication and Energy (“Department”), the Retail Energy Supply Association (“RESA”) hereby petitions to intervene as a party in the above-captioned docket.¹ As grounds therefor, RESA states as follows:

BACKGROUND

1. RESA is a nonprofit organization and trade association that represents the interests of its members in regulatory proceedings in the Mid-Atlantic, Great Lakes, New York and New England regions. RESA’s members include providers of competitive supply in most or all of the five New England states that have implemented electric deregulation.

2. On June 12, 2006, the Department issued an Order of Notice soliciting interventions concerning the May 26, 2006 Joint Petition of the NSTAR companies for

¹ RESA’s members include Consolidated Edison Solutions, Inc; Direct Energy Services, LLC; Hess Corporation; MidAmerican Energy Company URS; Reliant Energy Solutions; Sempra Energy Solutions; Strategic Energy, LLC; SUEZ Energy Resources NA, Inc. and US Energy Savings Corp. The opinions expressed in this filing may not represent the view of all members of RESA.

approval of merger pursuant to G.L. c. 164, § 96 (“Joint Petition”) on or before June 26, 2006.

INTERVENTION REQUEST

3. RESA members compete for retail electric customers in the service territories, of the NSTAR companies. Their ability to compete effectively for customers is dependent on reasonable and competitively neutral Basic Service pricing rules and procurement procedures that do not create a disincentive for customers to consider competitive supply alternatives. Additionally, as each of the NSTAR companies has historically maintained its own individual tariffs for default service and distribution service that reflected its own particular service attributes, NSTAR’s determinations regarding the terms and conditions that it proposes to apply to the combined company from these often-varying provisions of the individual companies are of critical importance. As such, RESA and its members have a substantial and specific interest in ensuring that the terms and conditions that will be put into effect for the NSTAR companies, following the proposed merger, are reasonable and do not adversely affect retail competition in Massachusetts electricity markets.

4. RESA requests that it be granted party status, so that it will be placed on the service list and have the right to participate fully in the proceedings as necessary and appropriate. RESA has not yet determined the nature of its participation in this docket.


5. RESA has participated as a party or limited participant in numerous electric dockets in Massachusetts and other New England states. RESA’s participation as a party in this Docket will protect in an efficient manner the interests of RESA’s members that do not otherwise seek party or limited participant status. To the extent that RESA members

participate individually in this docket, RESA will seek to coordinate its presentations with its members so as to avoid unnecessary duplication.

CONCLUSION

Accordingly, for the above-described reasons, the Department should grant the petition of RESA to intervene as a party in this proceeding.

RETAIL ENERGY SUPPLY
ASSOCIATION



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